

RESOURCE MANAGEMENT AGENCY

DEPT. OF TRANSPORTATION
 2005 JAN 13 1:02
county of ventura

Planning Division

Christopher Stephens
Director

December 20, 2004

(VIA FAX 202-493-2251, US MAIL &
 ELECTRONICALLY AT <http://dms.dot.gov>)

U. S. Department of Homeland Security

U. S. Coast Guard

U. S. Department of Transportation

Maritime Administration

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California State Lands Commission100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

Docket Management Facility

U. S. Department of Transportation

Room PL-401

400 Seventh Street SW

Washington, D. C. 20590-0001

4322-04-16877-854

Subject: Comments on the Draft Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) for the BHP Billiton LNG International, Inc. Cabrillo Port Liquefied Natural Gas Deepwater Port (Docket No. USCG 2004-16877; State Clearing House No. 2004021107)

Federal and State Lead Permitting Agencies:

The County of Ventura appreciates the opportunity to review and provide comments on the EIS/EIR for the proposed BHP Billiton LNG International, Inc. Cabrillo Port Liquefied Natural Gas Deepwater Port (DWP) project. The proposed DWP is an offshore, floating liquefied natural gas (LNG) import terminal and regasification facility that would be located approximately 13.9 miles offshore of Ventura County, California. The project

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also includes a natural gas pipeline laid on the ocean floor that would come ashore at Ormond Beach, near the City of Oxnard in Ventura County; and new onshore, underground pipelines to connect the offshore pipeline loops to the existing Southern California Gas Company intrastate pipeline system that transmits and distributes natural gas throughout the Southern California region.

As a Responsible Agency under the California Environmental Quality Act with discretionary permitting authority over portions of the proposed terrestrial onshore pipeline (depending on the exact route and location of the onshore pipeline), the County of Ventura requested the federal and state lead permitting agencies to thoroughly analyze and discuss the issues brought forward in our comment letter for the Notice of Intent (NOI) and Notice of Preparation (NOP) dated December 15, 2004.

The Ventura County Resource Management Agency, Planning Division, has now had the opportunity to review the Draft EIS/EIR and has the following comments:

- Clarify the need for further U.S. dependence on foreign sources for natural gas supply.
- Renewable Energy Sources and Energy Conservation were not carried forward as an alternative evaluated in the EIS/EIR (Section 3.0) Please clarify the reasoning for that decision.
- Clarify and elaborate on the ability of the County of Ventura's primary or secondary responder agencies, such as the Fire Protection District, the Sheriff Department, Medical Center and Office of Emergency Services, to fully recover its costs for programs designed or maintained to respond to incidents directly or indirectly related to the Cabrillo Port project pursuant to the Deep Water Port Act in Subsection 4.2.8, "Impact Analysis and Mitigation."
- Include a map of the underwater and terrestrial, onshore pipeline routes which clearly depicts the jurisdictional boundaries of the State, the City of Oxnard and the County of Ventura. Review the EIS/EIR to ensure that these distinctions are clearly identified in the text as they pertain to the onshore pipeline portion of the project.
- Section 4.2 (Public Safety-Hazards and Risk Analysis) outlines and discusses various hazard scenarios for the proposed LNG project. Table 4.2.2-1 displays a summary of LNG consequence scenarios. However, the EIS/EIR states on page 4.2-14 (line 22) that a "number of terrorist attack scenarios were screened out" earlier in the process. Please explain and/or clarify if the hazard scenario of a possible hijacking of an LNG carrier ship that is then used as a weapon, such as the releasing and ignition of its LNG cargo close to shore near populated areas, was evaluated. If this scenario was screened out, please explain the reasoning for that decision.

L015-1

L015-2

L015-3

L015-4

L015-5

L015-1

Section 1.2 discusses dependence on foreign energy sources.

Sections 1.2.2 and 1.2.3 contain updated information on natural gas needs in the U.S. and California. Forecast information has been obtained from the U.S. Department of Energy's Energy Information Agency and from the California Energy Commission.

L015-2

Sections 1.2.2, 1.2.3, 1.2.4, 3.3.1, 3.3.2, and 4.10.1.3 contain information on the need for natural gas, the role and status of energy conservation and renewable energy sources, and the California Energy Action Plan.

Sections 3.3.1 and 3.3.2 address conservation and renewable energy sources, within the context of the California Energy Commission's 2005 Integrated Energy Report and other State and Federal energy reports, as alternatives to replace additional supplies of natural gas.

L015-3

Section 4.2.5 discusses this topic.

L015-4

The information requested is on several maps. Figure 4.13-2 provides city and county boundaries. Figure 3.3-1 provides State and Federal boundaries offshore, and onshore county boundaries. Figure 3.4-2 provides the city and county boundaries.

L015-5

Table 4.2-2 and Sections 4.2.6.1 and 4.2.7.6 contain information on the threat of terrorist attacks.

Additionally, attached are comments that were received from other County agencies on the Draft EIS/EIR as a result of the County's intra-agency review of the document. These include the County of Ventura Planning Department Regional Plans Section, the County of Ventura Public Works Agency (PWA) Watershed Protection District, the PWA

Draft EIS/EIR for BHP Billiton- LNG International, Inc.
 Cabrillo Port LNG Facility
 December 20, 2004
 Page 3 of 3

Water Resources Division, the PWA Transportation Division, the Ventura County Sheriff's Department, the Ventura County Fire Protection District, and the Ventura County Air Pollution Control District. Any responses to these comments should be sent directly to the commenter, with a copy to Kim Rodriguez, AICP, Ventura County Planning Division, L#1740, 800 South Victoria Avenue, Ventura, CA 93009.

If you have questions regarding any of the specific comments from County agencies, please contact the appropriate respondent. If you have any general questions or comments, please contact Kim Rodriguez at (805) 662-6521 or by email at kim.rodriguez@mail.co.ventura.ca.us.

Thank you again for the opportunity to comment on this document.

Sincerely,



Chris Stephens, Director
 Resource Management Agency, Planning Division

ATTACHMENTS

C:
 Members of the Ventura County Board of Supervisors
 John F. Johnston, County of Ventura Executive Officer
 Tom Berg, Director, Ventura County Resource Management Agency
 Nancy Settle, Ventura County Resource Management Agency
 Kim Rodriguez, Ventura County Resource Management Agency
 Robert N. Kwong, Ventura County Counsel
 Kevin Keivanfar, P.E., Ventura County Watershed Protection District
 Lowell Preston, Ventura County Public Works Agency, Water Resources Division
 Nazir Lalani, Ventura County Public Works Agency, Transportation Division
 Dale Carnathan, Ventura County, Office of Emergency Services
 Craig Husband, Ventura County Sheriff Department
 John Dodd, Ventura County Fire Protection District
 Mike Villegas, Ventura County Air Pollution Control Officer

**County of Ventura
Resource Management Agency
Planning Division**

MEMORANDUM

Date: December 14, 2004

To: Kim Rodriguez, Senior Planner, Offshore Oil Policy Coordinator

From: Gene Kjellberg, Senior Planner, Regional Plans Section

Subject: Comments on Draft EIS/EIR for Cabrillo Port - Liquefied Natural Gas Deepwater Port

The Regional Plans Section has reviewed the pertinent chapters of the Draft EIS/EIR (specifically Section 4.16 - Socioeconomic Impacts of the Port's construction and initial operations) and offers these comments:

General Comments - Staff from Santa Barbara and Ventura Counties, working in cooperation with oil and gas industry representatives, developed a *Monitoring and Mitigating Socioeconomic Impacts of Oil/Gas Development Case Study* in June 2000 - see the following link <http://www.sbcag.org/PDFs/publications/MMSFinalReport.pdf>.

This case study documents the monitoring information, findings and mitigation programs that were developed as part of the Tri-County Socioeconomic Monitoring and Mitigation Program, from 1985 through 1995. It's recommended that the consultant(s) who developed the socioeconomic sections of the Cabrillo Port Draft Environmental Document obtain this report and incorporate appropriate elements in the draft EIS/EIR.

The Ventura County Board of Supervisors also adopted the *Ventura County OCS/Tidelands Socioeconomic Mitigation Program* in May 1989, that serves as the 'manual' for documenting socioeconomic impacts in Ventura County. The *Mitigation Program* divided socioeconomic impacts into three classes: 1) Public Facilities Impacts (e.g., libraries, schools, fire stations, water/sewer plants), 2) Public Services Impacts (e.g., police and fire protection services, criminal justice system), and 3) Housing Impacts (single-family and multi-family housing and transient facilities (campgrounds, RV parks). It's our recommendation that socioeconomic impact documentation and mitigation measures, related to the Cabrillo Port's construction and initial operations activities, should be formatted accordingly. This should also include cost estimates associated with impacts due to increased use of public facilities, public services and housing utilizing most recent CPI multipliers. A copy of the 1989 Mitigation Program is available from Planning Division staff.

EIR/EIS Statements and Regional Plans Section Comments:

1. It's estimated that between 200 and 240 workers will be needed to construct the onshore pipeline - it's also estimated that 85% of these workers would temporarily relocate to Ventura County for a period of about 8 months. (Page 4.16-2) Comment: Please provide more complete information that documents these estimated employment numbers and assumptions.

2. EIR/EIS also estimates that in-migrant (non-local) workers would bring other family members to Ventura County - a ratio of 0.8 family members per worker is cited. (Page 4.16-2) Comment: Please provide more complete documentation of the estimated worker/family multiplier.

L015-6
Section 4.16 discusses this document.

L015-7
Section 4.16 discusses this plan.

L015-8
The two cited documents were reviewed and considered for developing the socioeconomic analysis in this report; however, the methods they recommend were not followed due to the low number of employees involved in Project construction and operation.

L015-9
Section 4.16.1.2 has been updated with additional information on this topic.

L015-10
See the response to Comment L015-9.

L015-6

L015-7

L015-8

L015-9

L015-10

3. EIR/EIS cites housing vacancy rates in selected Ventura County cities in the year 2000 (Table 4.16-3) Comment: These vacancy rates are old and should be updated with 2004 numbers from the Southern California Association of Governments (SCAG), California Department of Finance (DOF), and/or the U.S. Census Bureau.

4. Table 4.16-4 in EIS/EIR cites temporary accommodations numbers in the project's vicinity - table is based on AAA's 2002 Tourbook/Campbook estimates. Comment: These figures are dated and reflect only those facilities that are included in the AAA documents. The draft EIR/EIS references use of coastal RV parks and tents for housing accommodations for workers and families. Updated campground information should be obtained from appropriate county, city and recreation and park district staff. The contact for County Parks is Theresa Lubin, County General Services Agency, Parks Dept. at (805) 654-3968. Information on hotel/motel room availability should be verified and updated through local chambers of commerce and/or the cities' community development department staff.

5. Table 4.16-5 cites 1999 worker and wage information for selected economic sectors. Comment: This 5-year old information should be updated with new figures from SCAG, the DOF and/or local chambers of commerce.

6. Table 4.16-6 (List of Public Services Agencies) is based on year 2000 information. Comment: This information should be updated to reflect current conditions - also recommend that the public services figures and ratios provided in Paragraph 4.16.1.4 should be incorporated in this table.

If you have any questions on the above comments or need further information, please contact me at (805) 654-2455 Nancy Settle at (805) 654-2465.

C Nancy Settle, Section Manager, Regional Programs
Theresa Lubin, General Services Agency, Parks
Chris Stephens, Planning Director

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L015-11

See response to Comment L015-9.

L015-11

L015-12

Table 4.16-9 identifies campgrounds in Ventura County. This information was provided to the Applicant by the Ventura County Parks Department in March 2005.

L015-12

L015-13

Table 4.16-10 presents average annual salaries in Ventura County in 2002. Table 4.16-11 presents the number of Ventura County workers by employment sector in 2003.

L015-13

L015-14

Table 4.16-6 in the October 2004 Draft EIS/EIR (now Table 4.16-13) has been updated with more recent information. The related text has been revised and no longer contains service ratios because the Project would not induce substantial growth or concentration of population during construction or operation.

L015-14

COUNTY OF VENTURA
PUBLIC WORKS AGENCY
WATERSHED PROTECTION DISTRICT

MEMORANDUM

November 19, 2004

TO: Kim Rodriguez
Resource Management Agency, Planning Division

FROM: Kevin Keivanfar, P.E. *KEVIN*
Manager, Permit Section

SUBJECT: Draft Liquefied Natural Gas Pipeline Facilities EIS & EIR
Oxnard to Saticoy, RMA 04-095

Pursuant to your request this office has reviewed the submittal and determined that the offshore portions of the project are not within District jurisdiction and no comments are necessary. For the pipeline portion of the project the following comments are still applicable.

1. All of the proposed pipeline routes will encroach into District watercourses and/or rights-of-way. Any construction within or across District facilities or rights-of-way requires District review and permitting.
2. Pipeline construction within a District right-of-way will require District review and permitting. An annual Facility Use Fee, payable to the District, is required for utility construction along District rights-of-way.
3. Any construction that will affect the structural integrity or maintenance of District facilities, such as the Santa Clara River Levee, will not be permitted.

L015-15

L015-16

L015-15

If the Applicant were to receive a license for the deepwater port from MARAD and a lease from CSLC, the Applicant, or its designated representative, would be required to adhere to all applicable local, State, and Federal laws, regulations, and permit requirements in the execution of all phases of the Project. Permits required are listed in Section 1.6.

L015-16

Comment noted.

If you have questions, feel free to contact me at 654-2906.

LOG NO. 20041116-005

COUNTY OF VENTURA
PUBLIC WORKS AGENCY
Watershed Protection District
Water Resources Division

MEMORANDUM

December 10, 2004

To: Kim Rodriguez
RMA Planning Division

From: Lowell Preston
Water Resources Division

Subject: **RMA 04-095, Draft Environmental Impact Statement & Environmental Impact Report – Cabrillo Port Liquefied Natural Gas (LNG) Deepwater Port.**

Project Description

Construct and operate an offshore floating storage and regasification unit (FSRU) that would be moored in Federal waters approximately 14 miles offshore of Ventura County in 2,900 feet of water. As proposed, LNG from the Pacific Basin would be delivered by LNG carrier to, and offloaded onto, the FSRU; re-gasified; and delivered onshore via two new 21.5-mile-long, 24-inch-diameter natural gas pipelines laid on the ocean floor. These pipelines would come onshore at Ormond Beach near Oxnard. New 14.3-mile and 7.7-mile-long pipeline loops would also be constructed to connect the offshore pipeline with the existing Southern California Gas Company intrastate pipeline system to distribute natural gas throughout the Southern California region. The facilities would be designed to deliver a peak of up to 800 million cubic feet per day.

The Deep Water Ports (DWP's) offloading facilities would be designed to accommodate LNG carriers ranging in capacity from 2.6 to 5.8 million gallons. The FSRU would be permanently moored, and would use a turret system to allow the FSRU to weathervane (rotate) around a fixed point. The FSRU, which would be designed for loading LNG from a side-by-side, moored LNG carrier, would be shaped like another vessel, double-sided, double-bottomed, and 938 feet long and 213 feet wide, with a displacement of approximately 190,000 deadweight tons.

Ships would be berthed and unloaded on the starboard side of the FSRU. The FSRU would store LNG in three Moss Spherical tanks. Each tank would have a 24 million gallon LNG storage capacity, and the total FSRU LNG storage capacity would be 72 million gallons. Onboard utilities and systems associated with FSRU operations would include electric power generation and distribution, instrumentation and controls, and fire and safety systems. The DWP would include all marine systems, communications, navigation

aids, and equipment necessary to safely conduct LNG carrier operations and receive product. This will be independently analyzed in the EIS/EIR.

A 200-foot-wide right-of-way would be set aside for the construction, with permanent rights-of-way in all offshore areas in which the 24-inch pipelines would be laid. The submarine pipelines would be buried from the 42.7 foot water depth approximately 0.3 miles offshore to its landfall at Ormond Beach within the city limits of Oxnard. The underground pipelines would be installed using the horizontal directional drilling technique. The underground pipelines would pass beneath Ormond Beach east of the Reliant Ormond Beach Generating Station in Oxnard. Gas would be metered at a small facility located inland approximately 0.3 miles. The facility would include a metering station, pig launcher/receiver, and odorant station. The onshore pipeline would continue through Ventura County into Los Angeles County. It would be constructed mainly adjacent to existing rights-of-way.

Comments

The Draft EIS and EIR does not address groundwater quantity or quality issues. Only surface water issues are addressed. Chapter 4.18 Water Quality and Sediments Section 1.3 Groundwater Resources made a brief reference on Groundwater elevations, aquifers, use of wells and how groundwater is managed. This is not an adequate analysis of groundwater impacts within the onshore portion of the proposed project. The final EIS and EIR should address groundwater quantity and quality impacts.

L015-17

Potential impacts on groundwater quality are discussed in Sections 4.12.4 and 4.18.4. No impacts are anticipated to groundwater quality or quantity. Section 2.7.1.2 describes how groundwater would be managed if encountered during construction.

L015-17